

### **REMARKS**

Claims 1-8 are pending. Reconsideration and allowance of the present application based on the following remarks are respectfully requested.

#### ***Claim Rejections Under 35 U.S.C. § 102***

Claims 1, 2, 4, 5, and 7 were rejected under 35 U.S.C. § 102(e) over Agrawal et al. (U.S. Publication No. 2004/0024901). Applicants respectfully traverse this rejection.

Amended claim 1 recites, in part, a system for managing a mobility service in Internet protocol networks that includes a transfer means with a plurality of nodes where each of the nodes includes a plurality of base stations and where the plurality of nodes are arranged such that there is a hierarchical structure between the plurality of nodes.

Although the Examiner, on pages 3 and 7 of the Office Action, alleges that Agrawal teaches a hierarchical structure for nodes, Applicants respectfully disagree. Specifically, Agrawal discloses a wireless network for facilitating the mobility of a node within a domain or network. In Agrawal, a network 240 includes a mobility agent 242 and subnets 250 and 260. As seen in Figure 2, the subnets 250 and 260 are both directly coupled to the mobility agent. As discussed in the Office Action, Figure 1 illustrates that a mobile node can move within a single subnet (micro-mobility) or from one subnet 30 to another subnet 30 (macro-mobility). The subnets 30, 250, and 260 are all analogous. As shown in Figure 1, the subnets 30 include a plurality of base stations 40. Although the Examiner alleges that the subnets 30 in Figure 1 are arranged in a hierarchical structure, Figure 2 actually illustrates the subnets arranged in a single layer (i.e., directly coupled to the mobility agent 242). See Figures 1 and 2, and page 5.

Specifically, in Agrawal each of the subnets 30 are connected to a mobility agent since, as shown in Figure 2, the subnets 250 and 260 are each connected to the mobility agent 242. At best, the mobility agent 242 is on a layer and all of the base stations are on a second layer. But this structure is well known in the prior art and is a hierarchical structure between a gateway and a node, not between a plurality of nodes as recited in claim 1.

Accordingly, Agrawal fails to teach, or even suggest, a system for managing a mobility service in Internet protocol networks that includes a transfer means with a plurality of nodes where each of the nodes includes a plurality of base stations and where the plurality of nodes are arranged such that there is a hierarchical structure between the plurality of nodes, as recited in amended claim 1.

Claims 5 and 7 are believed allowable for at least the reasons presented above with respect to claim 1 because claims 5 and 7 recite features similar to those discussed above with respect to claim 1.

Claims 2 and 4 are believed allowable for at least the reasons presented above with respect to claim 1 by virtue of their dependence upon claim 1. Accordingly, Applicants respectfully request reconsideration and withdrawal of these rejections.

***Claim Rejections Under 35 U.S.C. § 103***

Claims 3, 6, and 8 were rejected under 35 U.S.C. § 103(a) over Agrawal in view of the taking of Official Notice. Applicants respectfully traverse this rejection.

Claims 3, 6, and 8 are believed allowable for at least the reasons presented above with respect to claims 1 and 5 by virtue of their dependence upon claims 1 and 5 and because the combination of Agrawal and the taking of Official Notice does not remedy at least the deficiency of Agrawal discussed above. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

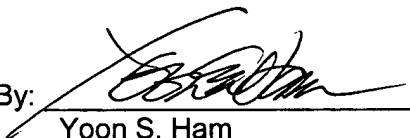
***Conclusion***

Therefore, all objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

Should any issues remain unresolved, the Examiner is encouraged to contact the undersigned attorney for Applicants at the telephone number indicated below in order to expeditiously resolve any remaining issues.

Respectfully submitted,

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